



Robert Moser, MD, Acting Secretary

Department of Health & Environment

Sam Brownback, Governor

February 14, 2011

Mr. Brian Hughes  
U.S. Army Corps of Engineers  
700 Federal Building  
601 East 12<sup>th</sup> Street  
Kansas City, Missouri 64106-2986

**Subject:** *Memorandum for Record, Surface Water Sampling of Forbes Field South Landfill Creek, 30 November 2010, and Quality Control Summary Report, Forbes Field, South Landfill Surface Water Sheen, in a letter dated 21 January 2011*

Dear Mr. Hughes:

The Kansas Department of Health and Environment/Bureau of Environmental Remediation (KDHE/BER) has reviewed the above referenced document, received on February 4, 2011. KDHE/BER submits the following comments.

**Memorandum of Record:**

1. **Item #2, page 1 of the Memorandum for Record:** The water samples collected were only analyzed for volatile organic compounds (VOCs). There were over fifteen unmarked 55-gallon drums in the area. Please explain the rationale for limiting the surface water investigation to only VOCs. Furthermore please explain the rationale for limiting the investigation to surface water. Groundwater, sediment and soil samples should also been collected and analyzed for Semi-Volatile Organic Compounds (SVOCs) and metals as well as VOCs.
2. **Item #5, page 2 of the Memorandum for Record:** KDHE believes that there is a concern. A large number of exposed 55-gallon drum, an oily sheen documented for 5 years on the surface water of the creek, and off-site migration reported by district staff needs to be addressed. KDHE recommends additional sediment, soil and groundwater sampling be conducted expanding the analytes to include SVOCs and metals. Furthermore, the drums in the area are obviously leaking an unknown substance into an uncontrolled environment. KDHE also recommends that these drums and their contents be tested and be sent for proper disposal.

40345901



Superfund

**Quality Control Summary Report, Forbes Field:**

1. **Appendix A:** There are a number of VOCs that were discussed in #4 of the Memorandum of Record or Chemicals of Concerns for the site that are missing from this report; vinyl chloride, styrene, tetrachloroethene and trichloroethene. Please explain the absence of these chemicals from the reported analyses of the surface water samples collected at this site.

If you have any questions please feel free to call me at (785) 296-6378.

Sincerely,



Travis Daneke

Environmental Scientist and Project Manager

Superfund Unit/Assessment and Restoration Section

cc: Ashley Allen → Forbes AFB (C4-089-70143-1)

Tom Winn, KDHE/NEDO

Paul Roemerman, EPA Region 7